

LAWLER, METZGER & MILKMAN, LLC

ORIGINAL

1909 K STREET, NW  
SUITE 820  
WASHINGTON, D.C. 20006  
PHONE (202) 777-7700  
FACSIMILE (202) 777-7763

October 19, 1999

RECEIVED

OCT 19 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**BY HAND**

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

EX PARTE OR LATE FILED

RE: Written Ex Parte Submission  
In the Matter of Deployment of Wireline Services  
Offering Advanced Telecommunications Capability  
CC Docket No. 98-147

Dear Ms. Salas:

Pursuant to section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. §1.1206(b)(1), an original and one copy of this letter are being provided to you for inclusion in the public record of the above-referenced proceeding.

Sincerely,



Ruth Milkman

cc: Carol Matthey  
Staci Pies  
Vincent Paladini

No. of Copies rec'd 021  
List ABCDE



EX PARTE OR LATE FILED

Maxim Telecom Consulting  
Group

P.O. Box 2448  
Mendocino, CA 95460

707 936-0636

916 491-1001

RECEIVED

OCT 19 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

October 19, 1999

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW – Room TW – A325  
Washington, D.C. 20054

Re: Written Ex Parte Submission, CC Docket No. 98-147

Dear Ms. Salas:

This letter responds to the ex parte filing on Line Sharing submitted by U S West on October 7, 1999. Part of that filing concerns the impacts of Line Sharing on Operations Support Systems (OSSs) and specifically comments on my Statement, which was submitted in this proceeding on September 30, 1999 (Statement), on behalf of Bluestar Communications, Inc., Covad Communications Company, HarvardNet, Inc., Network Access Solutions, NorthPoint Communications, Inc., and Rhythms NetConnections, Inc.

The U S West response includes what appears to be a more detailed description of potential impacts of Line Sharing on US West's OSS than was done for its previous filings in this proceeding. The Line Sharing Impact Assessment on pages 30 to 34 of the filing identifies each OSS and makes a brief statement about the potential modifications needed for each. Examples of the descriptions provided include for the Service Order Analysis and Control (SOAC) system on page 30, "Enhancements to accept shared line orders and manage the service order flow." and for the Work and Force Administration and Control (WFA-C) system on page 31, "Table Work for proper dispatch and workflow." These descriptions are quite general, making it difficult to discern the specific basis for the high estimated costs that appear on page 37.

In its October 7, 1999 filing, U S West concludes that the OSS modifications for Line Sharing are not as far-reaching, invasive and costly as claimed in its earlier filing dated July 22, 1999. For example, in the July 22, 1999 filing, it claimed that "U S West would be required to redesign and rewrite all of its billing systems, at enormous expense, to deal with the fact that two customers would be associated with a single loop." In its October 7, 1999 filing, US West estimates the cost to modify its billing systems to be between \$80,000 and \$100,000. Other examples are summarized in the attached Table 1.

We believe that U S West's most recent filing supports many of the findings and conclusions submitted in my Statement . However, we would like to address the following points:

1. Manual processing of line sharing orders can be done almost immediately. It is my understanding, based on statements made in various public meetings, that all U S West orders for its own ADSL service are processed with manual procedures, rather than flow-through provisioning. If U S West can do manual processing for its own ADSL orders, it surely can process ADSL orders from CLECs on shared lines using manual processes.
2. Since U S West is working towards flow-through processing and provisioning for all orders, including its own ADSL orders, the question then becomes one of parity. When flow-through processing and provisioning becomes available for its own needs, that OSS capability should also be made available for CLEC line sharing orders at the same time.
3. Many of the OSS changes described in the U S West filing as required for line sharing appear to be changes that would be needed by U S West to support its own flow-through processing and provisioning requirements. For example, the US West submission contains separate diagrams that depict network configurations for providing DSL service to its own retail customers over a shared line (p. 8) and for providing access to line sharing to competitive LECs (p. 11). The major difference between the two diagrams is the presence of an Interconnection Distribution Frame (ICDF) on the page 11 diagram. The diagrams are otherwise very similar and represent almost identical configurations that support the two different services. The ICDF appears to be a variation of intermediate distribution frames (IDFs) which have been widely deployed in central offices in the past for many existing applications. Since OSSs already accommodate IDFs, it is not clear what change is needed or if it is a requirement that is attributable to only CLEC-ILEC line sharing.
4. The cost estimates of \$2.6 Million to \$4.1 Million for modifying the provisioning/installation OSS appear to be high when considering that U S West needs some of the same functionality for its own flow-through order processing and provisioning. It is unclear whether this is an allocation for just the incremental cost of line sharing or the total for all of the functionality changes. In addition, many of the OSSs involved, such as Loop Facilities Assignment and Control System (LFACS), are provided by the same vendor and used by several ILECs so there should be economies due to scale and proration of common elements that do not appear to be reflected in U S West's cost estimates. These same concerns apply to the cost estimates of \$700,000 to \$1,200,000 for ordering OSS such as SOAC.

In summary, it appears that U S West agrees with my Statement that the functional OSS structure exists to accommodate line sharing and that in many cases it is only a matter of updating tables, business rules, assignment locations and codes to activate an inherent functionality. That view is consistent with the findings and conclusions described in my Statement. Should line sharing be ordered, U S West could immediately implement manual processing with the workarounds described in my Statement the affidavit (or similar ones), until the relatively minor permanent changes are completed.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dennis J. Austin", with a long horizontal flourish extending to the right.

Dennis J. Austin

Attachment

Table 1 - Summary of U S West's Estimated Impacts on OSS

U S West's 7/22/99 Estimates <sup>1</sup>	U S West's 10/7/99 Estimates <sup>2</sup>	Comments
Ordering – “U S West would have to undertake significant development work to implement new ordering...”	Now estimates that Ordering OSS changes will cost from \$700,000 to \$1,200,000 to accommodate line sharing	Not clear if estimates reflect only incremental line sharing costs and efficiencies due to scale and proration of common elements to all ILECs requiring similar modifications for their own needs and line sharing needs.
Installation - “Enormous development work would be required to process ...”	Now estimates that changes to provisioning OSS will cost from \$2,640,000 to \$4,100,000 to accommodate line sharing	This estimate appears to be overstated when you consider that U S West will need much of the same functionality to process its own ADSL orders on a flow-through basis. It would help to know if this is the total cost of the incremental cost associated with processing CLEC line sharing orders only. In addition, does this estimate reflect the economies of scale and proration of common elements?
Maintenance and Repair - “U S West would have to redesign its repair systems as a result of line sharing.”	Now estimates that changes to Repair OSS will run from \$80,000 to \$100,000	Several appear to involve only table updates.
Billing – “Incumbent LECs would have to engage in major overhauls of billing systems as a result of a line sharing requirement. US West would be required to redesign and rewrite all of its billing systems, at enormous expense to deal with the fact that two customers would be associated with a single loop.”	Now estimate that changes to Billing OSS will run \$80,000 to \$100,000 to accommodate line sharing	Only one of the two Billing OSS is impacted with what seems a minor change to bill for the shared line charges.

<sup>1</sup> Reply Comments of U S West Communications, Inc. 98-147 dated 7/22/99 at page 26

<sup>2</sup> Ex Parte filing of October 7, 1999 at page 37